



Department of Toxic Substances Control



Matthew Rodriguez
Secretary for
Environmental Protection

Barbara A. Lee, Director
9211 Oakdale Avenue
Chatsworth, CA 91311



Edmund G. Brown Jr.
Governor

April 13, 2016

Certified Mail 7014 3490 001 9019
Return Receipt Requested

Dr. Arthur Heath
Remediation Section Chief
Brownfields Programs
California Regional Water Quality Control Board, Los Angeles
320 W 4th St #200, Los Angeles, CA 90013

ABANDONMENT OF MONITORING WELLS INSTALLED UNDER DIRECTION OF REGIONAL WATER QUALITY CONTROL BOARD AT 4304 TEMPLE CITY BOULEVARD, EL MONTE, CALIFORNIA

Dear Dr. Heath:

The Department of Toxic Substances Control (Department) became lead agency for the former Crown City Plating Facility (Crown) at 4350 Temple City Boulevard in El Monte after the owners became bankrupt due to a Permit-by-Rule permit originally issued by DTSC to the facility. At one time Crown leased 4304 Temple City Boulevard from the railroad. Under the Well Investigation Program (WIP) and its U.S. Environmental Protection Agency CERCLA contract, the Regional Water Quality Control Board, Los Angeles (Board), ordered Crown to install groundwater monitoring wells to address the threat to ground water from its then-on-going operations. A Cleanup and Abatement Order was issued on May 1, 1992 to both Crown and the Southern Pacific Transportation Company (SPTCo), the former owner of 4304 Temple City Blvd. SPTCo has subsequently sold the property and it is ostensibly owned by American Trucking Company, (contact is Xu Huang at 1005 W. Olympic Blvd., Montebello, CA 91640).

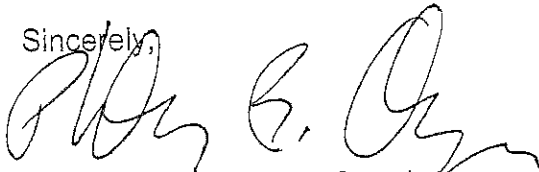
The City of El Monte has recently become concerned about ~ 5,000 yd³ mound of "dirt" that appeared on the property as well as unspecified grading activities that had occurred. In examining the property they noted one damaged well box and contacted the Department because they were aware that we were working with Temple CB, LLC to clean up the 4350 property. When I worked for the Board, we had specifically required installation of monitoring wells by Crown---perhaps under the 1992 Cleanup and Abatement Order. A minimum of three (3) wells with monitoring wells E-1 and E-2 having been installed on the 4304 property. One of these wells now appears to be underneath the "dirt" mound. Significant well damage was noted at the exposed well.

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Since the Department is only addressing the 4350 property, it is notifying the Board of the situation with regard to its old WIP wells which may represent an on-going threat to ground water from the 4305 property. It is suggested that the Board may want to utilize its authorities to assure proper abandonment of these old WIP wells. The contact at the City of El Monte (City) is Dave Gondek at (626) 580-2010, if you have questions about details of the "dirt" mound and the City's observations of the well conditions.

If you have any questions, please call me at (818) 717-6608 or by e-mail at Phil.Chandler@dtsc.ca.gov.

Sincerely,



Philip B. Chandler, R. Geophys.
Supervising Hazardous Substances Engineering Geologist I
Brownfields and Environmental Restoration Program

cc:

Mr. Xu Huang
American Trucking Company
1005 W. Olympic Blvd.
Montebello, CA 91640

Mr. Jay Hooper, CEO
Temple CB, LLC
4350 Temple City Boulevard
El Monte, California 91731

Mr. Steve Willkomm
Neighborhood Services Division
City Hall West
11333 Valley Boulevard
El Monte, CA 91731

Mr. Dave Gondek
City Attorney's Office
11333 Valley Boulevard
El Monte, CA 91731

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Mr. Jess Villamayor

Project Manager

Brownfields and Environmental Restoration Program

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Mr. John Naginis, CEG

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Senior Engineering Geologist

Brownfields & Environmental Restoration Program

Department of Toxic Substances Control

9211 Oakdale Avenue

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ORDER NO. 92-001

CLEANUP AND ABATEMENT ORDER
(FILE NO. AB 103.0096)

Cleanup and Abatement Order No. 92-001 requiring:

- a. Crown City Plating Company and the Southern Pacific Transportation Company (SPTCo) to Cleanup and Abate the effects of contaminants discharged to soils and ground water on the southern third of the site.
- b. Crown City Plating Company to Cleanup and Abate the effects of contaminants discharged to soils and ground water on the northern two-thirds of the site.

The California Regional Water Quality Control Board, Los Angeles Region, finds that:

1. Crown City Plating Co. has been operating at the 11.8 acre site located at 4300-4350 Temple City Blvd., El Monte CA, since 1956. Crown City Plating owns the northern two-thirds of the property and leases (since 1977) the southern third from Southern Pacific Transportation Co. (SPTCo). The southern third was previously leased to El Monte Iron and Metal, a scrap metal recycler.
2. The site is located within the adjudicated Main San Gabriel Ground Water Basin (Basin), which contains permeable sediments having high yield water production. Water from the Basin is beneficially used for municipal, domestic, industrial, and agricultural purposes, according to the Regional Water Quality Control Basin Plan (1991 Revision). This Basin is tributary to the Central Basin, providing an average of 98,415 acre-feet of water/year.
3. A chemical storage and use questionnaire, signed by Mr. Robert Coombes, President of Crown City Plating Co., reported site usage of: 1,1,1 trichloroethane (TCA), toluene, wash thinner, cutting oil and other chemicals.
4. Thirteen underground storage tanks (one - waste oil, two - absorption oil, one - nitric acid, and ten - fuel oil/gasoline), three clarifiers, and four sumps (installed between the years of 1956 to 1977 and located on Crown City Plating's property) and two underground fuel tanks (installation date unknown and located on SPTCo's property) were registered with the Los Angeles County Department of Public Works - Underground Tanks Section (DPW) on April 15, 1987 (see plot plan - Figure 1).

The underground storage tanks are reported to have been emptied and Crown City Plating has indicated its intentions to

remove the tanks. Under a Los Angeles County Department of Public Works Leak Detection Program and Tank Monitoring Program (LDP/TMP) three underground tanks (6, 7, and 8) failed a leak detection test in or about May 1986. Repairs were made to the tanks/tank piping systems and passed when re-tested in February 1987. The tank monitoring program has not been implemented. A subsurface investigation work plan dated March 1, 1990, stated that the tanks are to be removed in the "next few months." These tanks (except the nitric acid tank removed in 1985) are still in-place. In addition, a septic tank and associated leach field are located outside the northeast corner of the maintenance building, approximately 50 feet from the drainage ditch. Septic tanks and associated leach fields are potential sources for ground water contamination that must be evaluated.

5. Crown City Plating Co. has not complied fully with the applicable portions of the California Underground Storage Tank Regulations (California Code of Regulations, Title 23, Division 3, Chapter 16, Article 4). For example, section 2641, which states in part "Owners of existing underground storage tanks subject to this article shall implement a monitoring program which is capable of detecting any unauthorized release from any portion of the underground storage tank system at the earliest possible opportunity, except for piping"
6. Regional Board staff inspected the site on May 13, 1987, and became aware of certain historic situations that may have resulted in potential ground water contamination. The outside chemical storage area on SPTCo property southeast of the loading dock was subjected to solvent spillage as evidenced by discolored and degraded asphalt. There were signs of spillage (primarily discoloration) directly onto the soil at the fence line.
7. A Phase I subsurface investigation report dated February 18, 1988, identified 3 mg/kg TCA, and 0.3 mg/kg PCE in site soils on property owned by the Southern Pacific Transportation Co. (SPTCo) and leased to Crown City Plating.
8. On April 19, 1988, Regional Board staff required the submittal by May 23, 1988, of a site audit and work plan to determine the extent of site contaminants in the unsaturated zone and determine whether site derived soil contaminants have impacted ground water. An acceptable work plan, submitted on September 14, 1988, was approved with a schedule for report submittal by November 21, 1988.
9. A letter from the SPTCo dated December 14, 1988, acknowledged receipt of a request to conduct a soil investigation on the SPTCo's operating railway right-of-way. This letter suggested

that entry would not be approved until after February 1989. Therefore, Regional Board staff placed the required investigation on the railroad easement in abeyance to accommodate SPTCo's scheduling needs for granting access to the area.

10. A site assessment report dated February 1989 was submitted to Regional Board staff. This report identified the presence of PCE (320 $\mu\text{g/kg}$), TCA (2890 $\mu\text{g/kg}$), methylene chloride (82 $\mu\text{g/kg}$), acetone (68 $\mu\text{g/kg}$), and toluene (6.0 $\mu\text{g/kg}$) in site soils. TCA (42 $\mu\text{g/kg}$), was identified as deep as 40 feet below ground surface (bgs) in site soils. The report also identified TCA (45 $\mu\text{g/l}$), PCE (150 $\mu\text{g/l}$), TCE (300 $\mu\text{g/l}$), and 1,1-DCE (15 $\mu\text{g/l}$) in underlying ground water. TCE and 1,1-DCE are breakdown products of PCE.
11. On March 24, 1989, upgradient ground water monitoring wells were required and a bi-monthly ground water monitoring program was initiated. The first ground water elevation gauging and sampling progress report was due on May 15, 1989. The required technical report was not submitted.
12. On September 5, 1989, a work plan to investigate underlying ground water contamination was submitted to Regional Board staff. The work plan was conditionally approved on September 22, 1989, with a schedule for submittal of the investigation report by December 16, 1989.
13. On March 5, 1990, the investigation report was submitted to Regional Board staff. This report identified TCE (11 $\mu\text{g/kg}$) in site soils 40 feet bgs in the monitoring well E-2 boring and 80 feet bgs (8 $\mu\text{g/kg}$ TCE) in the monitoring well E-3 boring. The report concluded the TCE to be from the near-by drainage ditch. No additional soil or soil vapor sampling was performed to substantiate this conclusion. TCE was detected in ground water samples collected from ground water monitoring wells E-1, E-2, and E-3 at 220 $\mu\text{g/l}$, 2,000 $\mu\text{g/l}$, and 9 $\mu\text{g/l}$ respectively.
14. PCE and TCE are halogenated organic solvents that are Proposition 65 listed contaminants. They attack the kidneys, liver, respiratory system, eyes (PCE), and heart (TCE). The substances are carcinogenic and toxic to humans. The state action levels regarding toxicity, developed by the Department of Health Services, are 5 $\mu\text{g/l}$ for both compounds in drinking water.
15. Unauthorized discharge of waste has occurred in violation of Section 13260 of the California Water Code, which requires that any person proposing to discharge waste to land must file a report of waste discharge and receive waste discharge requirements from the Regional Board.

16. The unpermitted discharges of wastes on the properties owned by SPTCo. and Crown City Plating are illegal and threaten beneficial uses of the underlying body of ground water.
17. Section 13304 of the California Water Code states, in part, that: "Any person...who has caused or permitted...any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the Regional Board cleanup such waste or abate the effects thereof or, in the case of threatened pollution or nuisance, take other necessary remedial action."
18. On May 7, 1990, a General Notice of Potential Liability as defined by Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9607(a) as amended ("CERCLA"), and request for information pursuant to § 104 of CERCLA was issued to Mr. Robert L. Coombes, Sr. of Crown City Plating Co. by the United States Environmental Protection Agency-Region IX.
19. On August 29, 1990, the bi-monthly ground water elevation gauging and sampling progress report submittal frequency was reduced to a quarterly basis. This change was made based on ground water reports submitted and allow the site to sample its monitoring wells at the same frequency as the surrounding sites. The first quarterly ground water elevation gauging and sampling progress report was due on October 15, 1990. This report was not submitted to Regional Board staff.
20. On September 7, 1990, Crown City Plating Co., as the discharger, and SPTCo, as the land owner were required by Regional Board staff to submit a subsurface investigation work plan to determine the lateral extent of site contaminants on SPTCo property (specifically in the drum storage area and in the area near monitoring well E-2). In addition, Crown City Plating Co. was directed to:
 - a. Investigate the source and extent of site contaminants on its property along the drainage ditch, near the septic tank and associated leach field, and in the underground tank areas.
 - b. Provide a status report and time schedule for the proposed closure of the underground tanks at the site.
 - c. Provide pump test data and or draw down information from the site production well and/or monitoring wells to substantiate ground water conductivity estimates presented in the March 1990 report.

This work plan was scheduled to be submitted to this Regional Board by October 15, 1990.

21. On March 27, 1991, Crown City Plating requested an extension until June 30, 1991, for submittal of the required work plan. This extension was conditionally granted subject to Crown City Plating sampling their ground water monitoring wells and submitting the quarterly ground water elevation gauging and sampling progress report to this Regional Board by May 15, 1991. This report was not submitted to the Regional Board.
22. On October 30, 1991, a Notice of Overdue Technical Reports was issued to both SPTCo, and Crown City Plating Co. by Regional Board staff. This letter directed both parties jointly to investigate the extent of site derived contaminants on their respective properties. A report of this investigation was required to be submitted to the Regional Board by November 29, 1991. In addition, they were directed to sample the site ground water monitoring wells immediately and submit a quarterly ground water elevation gauging and sampling progress report to this Regional Board by January 15, 1992. These technical reports were not submitted.
23. On November 22, 1991, in response to the Regional Board letter dated September 7, 1990, SPTCo. requested "... that a 90 day extension be granted by the Board to Crown City for performance of the work on SPTCo property...." The extension was requested because "...SPTCo did not obstruct or delay Crown City in any way in the process of performing any work directed by the Board, either on the Crown City lease premises, or within the operating right-of-way." This is insufficient justification for granting a 90 day extension for submittal of the required technical reports. In addition, SPTCo was required to submit the work plan jointly with Crown City Plating.
24. This enforcement action is being taken for the protection of the environment and as such is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. seq.) in accordance with Section 15321, Chapter 3, Title 14, California Code of Regulations.

IT IS HEREBY ORDERED, pursuant to California Water Code 13304, that:

1. Crown City Plating Company and the Southern Pacific Transportation Company shall Cleanup and abate the on-site soil contamination at the Southern Pacific Transportation Co. property located at 4300 Temple City Blvd., El Monte, CA., and leased to Crown City Plating.

2. Crown City Plating Company shall Cleanup and abate the on-site soil contamination at the Crown City Plating property located at 4350 Temple City Blvd., El Monte, CA.
3. Provide to the Regional Board, for review and approval, four copies of an acceptable systematic work plan to investigate all on-site vadose zone contamination sources, to define lateral and vertical extent of such contaminants, to characterize and evaluate contaminant behavior, and to evaluate the risk to ground water from any discharged pollutants (i.e., chemicals). Prepare the subsurface investigation work plan according to the attached Soil Gas Investigation Requirements. Submit to this Regional Board four copies of the investigation report for Regional Board staff review and evaluation.
4. Provide to the Regional Board, for review and approval, four copies of an acceptable systematic work plan to remediate on-site soil contaminants. Provide four copies of the subsequent report of on-site soils remediation.
5. Provide to the Regional Board, for review and approval four copies of an acceptable systematic work plan to assess ground water contamination at and proximal to the site:
 - a. Delineate the extent of ground water contamination in the upper saturated zone and determine if any underlying saturated zone(s) are contaminated.
 - b. Develop specific aquifer characteristics, such as hydraulic conductivity, for uppermost saturated zone.
 - c. Assess hydraulic characteristics and conductivity (i.e., determine the connection between saturated units or aquitards).
 - d. Prepare a ground water monitoring and testing schedule.

Submit to this Regional Board four copies of the assessment report for Regional Board staff review and evaluation.

6. Perform the foregoing according to the following time schedule:

<u>Action</u>	<u>RAP or Work Plan</u>	<u>(following approval of work plan)</u>
a. Investigate on-site soil contamination.	June 2, 1992	(9 weeks)
b. On-site soil remediation.	August 10, 1992	(10 weeks)

- | <u>Action</u> | <u>RAP or
Work Plan</u> | <u>(following
approval of
work plan)</u> |
|---|-----------------------------|--|
| c. On-site and proximal off-site ground water contamination assessment. | November 2, 1992 | (6 months) |
| <p>7. Submit to this Regional Board quarterly progress, ground water elevation gauging and sampling reports <u>until completion of all Regional Board mandated work</u>. These reports shall be submitted by the <u>fifteenth day</u> of January, April, July, and October for the preceding three month period. The first quarterly progress, well gauging and monitoring report is due by April 15, 1992.</p> | | |
| <p>8. Quarterly progress, well gauging and monitoring reports must contain at a minimum the following information:</p> | | |
| <p>a. A summary of quarterly ground water elevation measurements from mean sea level and depths to ground water from all site wells. Wells should be sounded for total depth at each gauging episode. This information should be presented in tabular form and on a diagram depicting the location of the borings/wells with ground water contours depicting groundwater flow direction and gradient information.</p> | | |
| <p>b. Analyses of the ground water from each site well during the sampling period, together with an evaluation of the test results.</p> | | |
| <p>c. Activities completed during the reporting period and activities proposed for the next reporting period.</p> | | |
| <p>9. Any requests for extensions must provide justification for an extension and be submitted in writing. Extensions are granted subject to the Executive Officer's discretion.</p> | | |
| <p>10. Provide to the Regional Board advance notice of any planned physical alterations to the facility or planned changes in the facility's activities that may affect compliance with this order.</p> | | |
| <p>11. Provide to the Regional Board advance notice of any planned change in name, ownership, or control of the facility; provide notice to any succeeding owner or operator of the existence of this Order by letter; forward a copy of such notification to the Regional Board.</p> | | |

This order may be revised by the Regional Board through its
staff or by the Regional Board from the
information(s) becoming available. The authority of the
Regional Board is contained in the California Water Code, to
conduct investigation and develop additional information described
herein is in no way limited by this order.

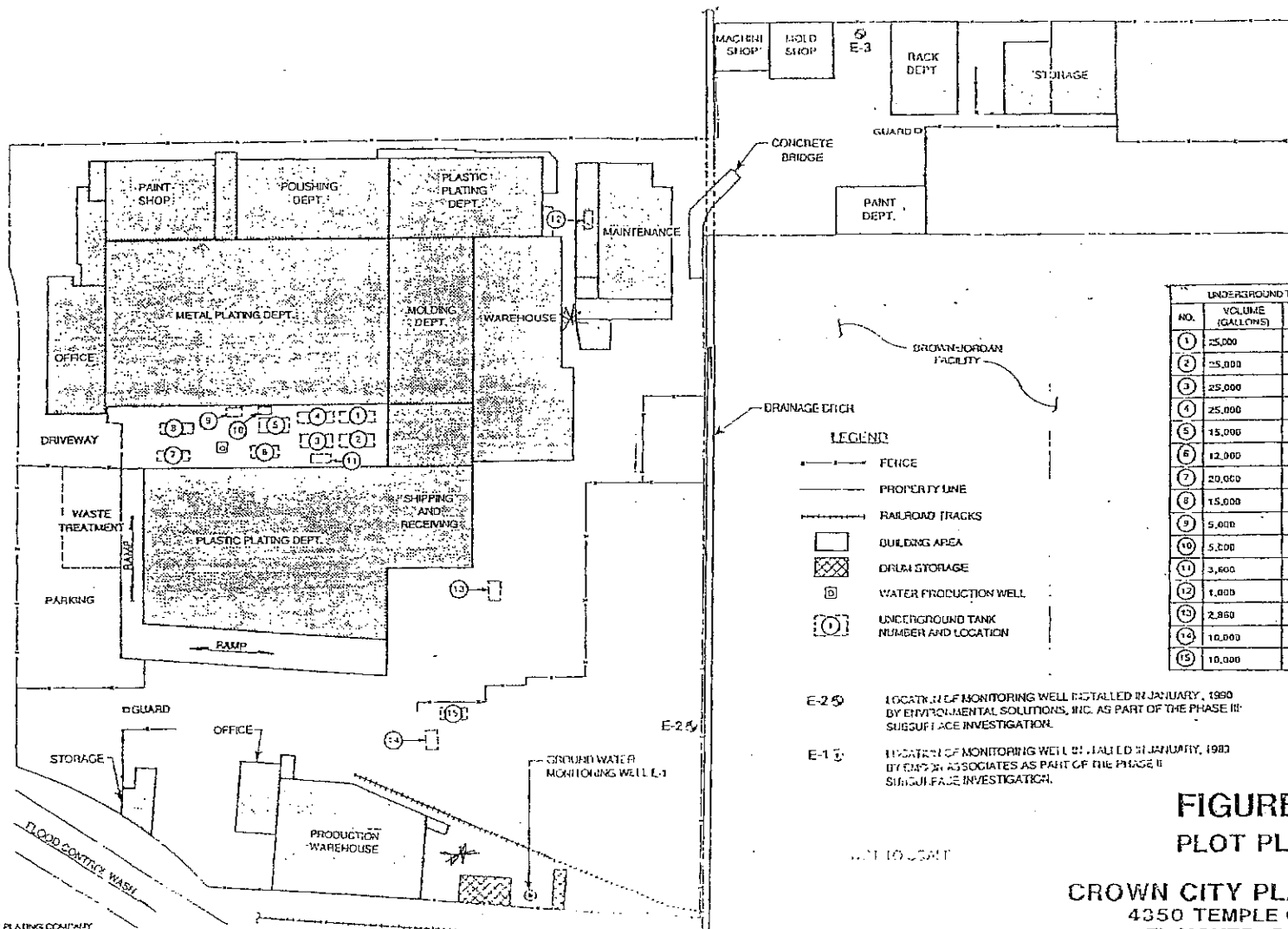
Failure to comply with the terms or conditions of this order may
result in imposition of civil liabilities, either administratively
by the Regional Board or judicially by the Superior Court according
to Section 13300 et seq., of the California Water Code, and/or
referral to the Attorney General of the State of California for
action as he may deem appropriate.

Very truly yours,

Regional Board, California
Water Code

Very truly yours,

TEMPLE CITY BLVD



REFERENCE: CROWN CITY PLATING COMPANY
PLOT PLAN AND REFERENCE DRAWING
80-2-5 (PART 1) 17-2-385

FIGURE 1
PLOT PLAN
CROWN CITY PLATING CO.
4350 TEMPLE CITY BLVD.
EL MONTE, CA. 91731